

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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LEWIS S. CLARK and PATRICIA E. CLARK  
Individually and on Behalf of All Others  
Similarly Situated,

Plaintiffs,

v.

BARRICK GOLD CORPORATION, AARON  
W. REGENT, JAMIE C. SOKALSKY, and  
AMMAR AL-JOUNDI,

Defendants.

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CIVIL ACTION  
NO. 1:13-cv-03851-RPP

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CLEMENT BERNARD, Individually and  
on Behalf of All Others Similarly Situated

Plaintiff,

v.

BARRICK GOLD CORPORATION, AARON  
W. REGENT, JAMIE C. SOKALSKY, and  
AMMAR AL-JOUNDI,

Defendants.

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CIVIL ACTION  
NO. 1:13-cv-04123-RPP

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CITY OF BROCKTON RETIREMENT SYSTEM,  
Individually and on Behalf of All Others  
Similarly Situated,

Plaintiff,

v.

BARRICK GOLD CORPORATION, AARON  
W. REGENT, JAMIE C. SOKALSKY, and  
AMMAR AL-JOUNDI,

Defendants.

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CIVIL ACTION  
NO. 1:13-cv-05437

**RESPONSE OF INTERNATIONAL PAINTERS AND ALLIED TRADES  
PENSION FUND, RHONDDA CYNON TAF PENSION FUND AND PENSION  
FUND AND TREASURY OF SURREY TO LEAD PLAINTIFF MOTIONS**

International Painters and Allied Trades Pension Fund, Rhondda Cynon Taf Pension Fund and Pension Fund and Treasury of Surrey (“Painters Group”),<sup>1</sup> which filed a lead plaintiff motion pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. §78u-4(a)(3)(B), submits this response to the several lead plaintiff motions filed in this case. The Painters Group, which in its motion reported losses of approximately \$6.6 million from transactions covered by the claims and class period alleged in the complaints, believed at the time that it had the largest financial interest in the relief sought by the class. After reviewing the motions filed by others, however, it appears that the group of Union Asset Management Holding AG and LRI Invest S.A. (“Institutional Investor Group”) has losses approximately 10 times the losses suffered by the Painters Group and appears to have by far the largest financial interest in the relief sought in this case. Under Section 21D(a)(3)(B)(iii)(I), 15 U.S.C. §78u-4(a)(3)(B)(iii)(I), therefore, the Institutional Investor Group appears to be the presumptive lead plaintiff.

The Painters Group is aware of at least 5 cases in the last 7 years or so in which Union Asset Management Holding AG, the member of the Institutional Investor Group with the larger loss, has been appointed as a lead or co-lead plaintiff. And, as set forth in that group’s motion, the Institutional Investor Group has selected class and liaison counsel experienced in the field of securities class action litigation.

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<sup>1</sup> In their lead plaintiff motion, the members of the Painters Group used the name “Institutional Investor Group.” Because another group used the same name in its motion, the members of the Painters Group have selected that name here to avoid confusion.

Should the Court decide not to appoint the Institutional Investor Group as the lead plaintiff, the Painters Group qualifies for appointment as lead plaintiff and is ready to serve.

Dated: August 21, 2013

Respectfully submitted,

**BARRACK, RODOS & BACINE**

By: /s/ Jeffrey A. Barrack

A. Arnold Gershon  
Michael A. Toomey  
425 Park Avenue, 31st Floor  
New York, NY 10022  
Telephone: (212) 688-0782

-and-

Jeffrey A. Barrack  
3300 Two Commerce Square  
2001 Market Street  
Philadelphia, PA 19103  
Telephone: (215) 963-0600

*Counsel for the International Painters  
and Allied Trades Industry Pension  
Fund, Rhondda Cynon Taf Pension  
Fund, and Pension Fund and Treasury  
of Surrey*

*Of counsel:*

Daniel E. Bacine  
Chad A. Carder  
**BARRACK, RODOS & BACINE**  
3300 Two Commerce Square  
2001 Market Street  
Philadelphia, PA 19103  
Telephone: (215) 963-0600